REMARKS

Status of Claims

Claims 2-4, 9-12, 17, and 19-31 are pending. By this amendment, claims 11, 17, 19, 22, and 24 are amended, and new claims 32-33 are presented. No new matter is entered.

Claim Rejections: 35 U.S.C. § 112, second paragraph

Claims 2-4, 9-12, and 19-22 were rejected under 35 U.S.C. § 112, second paragraph for being indefinite.

Claim 19's preamble has been amended to specify that the system comprises components.

Claim 11 was rejected for reciting "and/or." Applicant has amended the claim to remove this recitation (and has similarly amended claim 24) and asks the Examiner to reconsider and withdraw this rejection.

Claim 22 was rejected for lacking certain antecedent basis. Applicant has amended the claim and asks the Examiner to reconsider and withdraw the rejection.

For these reasons, Applicant asks the Examiner to reconsider and withdraw the rejections.

Claim Rejections: 35 U.S.C. § 102

Claim 17 was rejected under 35 U.S.C. § 102(e) as encompassing subject matter anticipated by U.S. Pat. No. 6,839,678 to Schmidt.

Applicant asks the Examiner to reconsider and withdraw the rejection. As amended, claim 17 requires (among other limitations) preventing direct communication between the server and the matcher, a feature which Schmidt does not disclose. The

limitations added to claim 17 by this amendment do not raise new issues because the Examiner has already considered similar limitations in examining claim 19 and other claims.

Claim Rejections: 35 U.S.C. § 103(a)

Claims 2-4, 9-12, and 19-31 were rejected under 35 U.S.C. § 103(a) as encompassing subject matter unpatentable over U.S. Patent Application Publication No. 2002/0002474 to Michelson et al. in view of U.S. Pat. No. 6,014,631 to Teagarden et al.

Applicant asks the Examiner to reconsider and withdraw the rejection because even if Michelson and Teagarden are combined in the manner urged by the Examiner, the combination still does not teach, for each claim, every element in the claimed arrangement.

The Examiner acknowledged that Michelson does not expressly disclose a system including a security layer but took the position that Teagarden discloses a security layer having the features required by each of claims 2-4, 9-12, and 19-31 and that it would have been obvious to incorporate Teagarden's security layer into Michelson's system.

But careful study of Teagarden shows that his security layer lacks features required by the rejected claims. Claim 19 requires, among other things, that the security layer prevent direct communication between the server and the matcher. In contrast, Teagarden's security layers 424 and 450, as shown in Figs. 10-13, are merely interposed between central computer 402 and the Internet 448. Consequently, they act as traditional firewalls to protect Teagarden's system from external Internet-based attacks. Teagarden's security layer does not prevent direct communication between any components of his system. Indeed, Teagarden repeatedly states that the principal purpose

of the security layer 424 or 450 is "to prevent unauthorized intrusion into central

computer 402," (col. 14, lines 30-31, 46-47, and 62-63), not to prevent direct

communication between various parts of his system. Moreover, Figs. 10-13 clearly show

that Teagarden's central computer 402 remains directly connected to work stations 414,

420, central database 404, and medical distribution system 410 despite the presence of a

security layer. Teagarden expressly teaches that "[w]orkstation computers 414, 420

communicate with central computer 402 via an optional local area network 456" (col. 14,

lines 63-65).

     So grafting Teagarden's security layer onto Michelson's system would simply

result in a standard firewall protecting Michelson's system from Internet attacks. It

would not prevent direct communication between any components of Michelson's

system.

                                        Respectfully submitted,
                                        Foley Hoag LLP

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Customer No. 25181
World Trade Center West   /SCOTT E. KAMHOLZ/
155 Seaport Boulevard   Scott E. Kamholz, Reg. No. 48,543
Tel.: (617) 832-1241   Attorney for Applicant
Fax: (617) 832-7000